REMARKS

In response to the Office Action of August 13, 2004, the Applicant submits this Reply.

In view of the foregoing amendments and following remarks, reconsideration is requested.

Claims 1-6, 9, 11-12, 14 and 25-30 remain in this application, of which claims 1, 6, 9, 12 and 25 are independent. No fee is due for claims for this amendment.

Rejections of Claims 1-6, 9, 12, 25 and 27 Under 35 U.S.C. §103

Claims 1-6, 9, 12, 25 and 27, of which claims 1, 6, 9, 12 and 25 are independent, were rejected under 35 U.S.C. §103 in view of U.S. Patent 5,659,793 ("Escobar") and U.S. Patent 6,564,263 ("Bergman"). This rejection is respectfully traversed.

According to Escobar, as shown in its Fig. 1, a "Video Time Line" 140 and 141 and a "Program Object Time Line" 160 are used to specify a multimedia program. "To develop a program object, first, a specification (400) for the object is prepared." *Escobar*, col. 8, lines 56-57. The Office Action appears to assert that this specification 400 is a "specification for each layout object," but instead Escobar clearly is referring to the specification or *design* for a program object for which computer program code is to be written. See *Escobar*, col. 8, lines 49-67. This portion of Escobar does not teach or suggest a "layout specification" as claimed. Escobar, in Fig. 1, also illustrates a "display/edit window 100." The Office Action refers to this element 100 as a "layout/editing window". No such term is used in Escobar. Thus, Escobar's reference to a specification 400 and to a display/edit window 100 have nothing to do with the claimed "layout specification." Nonetheless, the Office Action admits that "Escobar fails to disclose a layout specification defining a spatial relationship between layout elements."

According to Bergman, an "Inter Object Specification" may include operators that describe spatial relationships between objects. See *Bergman*, Fig. 5 and Col. 4, lines 20-23. More particularly, Bergman teaches that spatial relationships among objects are represented by "spatial operators" that define "a complex graph . . . represented by . . . pair-wise relationships." See *Bergman*, col. 16, line 61 to col. 17, line 59, particularly col. 17, lines 53-55. Thus, in Bergman, these pair-wise operators define spatial relationships between objects, but not between objects and display areas of a display.

In contrast, independent claim 1 recites that "the layout specification indicates, for each track of the one or more first tracks and one or more second tracks, a portion of the display area

in which media from the track will be displayed." Similar limitations regarding a "layout specification" are found in independent claims 6 and 9. In independent claims 12 and 25, the term "layout specification" is not used, however, the claims recite a similar limitation in the "an indication for each track in the timeline a portion of the display area in which media from the track will be displayed."

Thus, whereas Bergman relates arbitrary objects *to each other* spatially, the "layout specification" of the claimed invention specifically relates *tracks* to defined *display areas* within a display (instead of relating tracks to each other using spatial operators).

Accordingly, the independent claims are distinguished from any combination of Escobar and Bergman and the rejection of the independent claims 1, 6, 9, 12 and 25 under 35 U.S.C. §103 in view of Escobar and Bergman is traversed. The remaining claims are dependent claims that are allowable over Escobar and Bergman for at least the same reasons.

Moreover, regarding claim 6 and dependent claim 27, which includes a limitation of a "table of contents track," the Office Action *again* relies *solely* on Escobar's teaching that "at least one interactive object track 160 should be included." *Escobar*, col. 6, lines 26-28. As indicated in the Applicant's prior Reply, the "table of contents track" as claimed specifically includes "nontemporal media including one or more elements comprising one or more characters, each associated with a point in time on the table of contents track." In use, the table of contents track is claimed as follows: "wherein selection by the user of the displayed characters of the one or more elements in the table of contents track initiates display of the temporal and nontemporal media from the point in time of the selected element." The Office Action does not explain how these limitations are taught by Escobar.

Accordingly, the rejection of claims 6 and 27 under 35 U.S.C. §103 in view of Escobar and Bergman also is traversed for this additional reason.

Rejection of Claims 11, 14, 26 and 28 Under 35 U.S.C. §103

The remaining dependent claims 11, 14, 26 and 28-30 were rejected under 35 U.S.C. §103 in view of Escobar, Bergman and U.S. Patent 6,081,262 ("Gill"). This rejection is respectfully traversed.

To the extent that this rejection relies on the rejection of the independent claims 9, 12 and 25 based on Bergman and Escobar, the rejection is traversed for the reasons noted above.

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According to Gill, a "multi-media page layout," an example of which is shown in Fig. 2, may be defined by a user. See *Gill*, col. 9, lines 57-59. In Gill, "multiple objects are placed on a page, with these objects having different characteristics." *Gill*, col. 9, lines 61-62.

In the example shown in Fig. 2 of Gill, a "path PL . . . has an initiation point IP and a terminating point TP, which path PL is of arbitrary extent, length and geometry. . . . The path PL represents a motion definition for a[n] object having some content, which object is tied to the path." *Gill*, col. 10, lines 22-26. Thus, Gill's path in Fig. 2 is not a claimed "time bar" as recited in claims 11, 14 and 26. Accordingly, the rejection of claims 11, 14 and 26 based on Escobar and Bergman further in view of Gill is traversed.

Also in the example shown in Fig. 2 of Gill, a "movie object MB" is specified by an author, "into which is imported a movie." *Gill*, col. 10, lines 11-12. However, the capability of an author to add a movie object to a page in Gill is not the same as the claimed "display area" that "is divided into a plurality of frames" where "each of the plurality of frames is assigned to one of the first or second tracks of the timeline." Accordingly, the rejection of claim 28 based on Escobar and Bergman further in view of Gill is traversed.

Regarding claims 29 and 30, these claims are further dependent on dependent claim 28 and are allowable for at least the same reasons. Furthermore, the rejection of these claims is based primarily on Bergman. According to Bergman, various descriptors can be defined in XML In other words, the various data structures used in an "InfoPyramid" of Bergman may be represented in XML. See *Bergman*, col. 14, lines 4-67.

The Office Action has misconstrued claim 29 as reciting that the "multimedia presentation [is] defined by a markup language document . . .." See *Office Action*, page 7, last line to page 8, first line. Claim 29 instead recites that the "layout specification is . . . defined by a document in a markup language that defines a set of frames in a display area." The portion of Bergman relied upon in the Office Action fails to teach this limitation. Claim 29 also recites that the "definition of each frame . . . includes an indication of a track of the timeline to which the frame is assigned." The portion of Bergman relied upon in the Office Action fails to teach this limitation.

Accordingly, the rejection of claim 29 is traversed. Claim 30 is dependent on claim 29 and is allowable for at least the same reasons.

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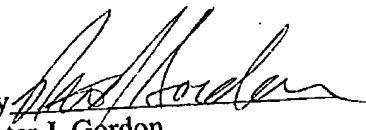Reply to Office Action of August 13, 2004

CONCLUSION

In view of the foregoing amendments and remarks, this application should now be in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this reply, that the application is not in condition for allowance, the Examiner is requested to call the Applicants' attorney at the telephone number listed below.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicants hereby request any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, please charge any fee to **Deposit Account No. 50-0876.**

Respectfully submitted,

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